

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

KRISTIN CAMPBELL,

Defendant.

Case: 2:24-cr-20554  
Assigned To : Cox, Sean F.  
Referral Judge: Altman, Kimberly G.  
Assign. Date : 10/1/2024  
Description: IND USA V KRISTIN  
CAMPBELL (SS)

Violation:  
18 U.S.C. § 922(a)(1)(A)

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

*Engaging in the Business of Dealing in Firearms Without a License*  
18 U.S.C. § 922(a)(1)(A)

From in or about May 1, 2020, and continuing through in or about April 24, 2024, in the Eastern District of Michigan, Southern Division, the defendant, Kristin Campbell, not being a licensed dealer and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of manufacturing and dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

**FORFEITURE ALLEGATION**

*Criminal Forfeiture*

(18 U.S.C. § 924(d) together with 28 U.S.C. § 2461)

1. The allegations contained in Count One of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461.

2. Upon conviction of the offense charged in Count One of this Indictment, in violation of Title 18, United States Code, Section 922(a)(1)(A), defendant Kristin Campbell shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461, any firearm and ammunition involved in or used in defendant's knowing violation.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

*s/ Grand Jury Foreperson*  
Grand Jury Foreperson

DAWN N. ISON  
United States Attorney

*s/ Sara D. Woodward*  
SARA D. WOODWARD  
Chief, General Crimes Unit

*s/ Stephen Carr*  
STEPHEN CARR  
Assistant United States Attorney

Dated: October 1, 2024

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United States District Court  
Eastern District of Michigan

## Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in an ~~response~~.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> SC

**Case Title:** USA v. Kristin Campbell

**County where offense occurred :** Wayne

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

     Indictment/      Information --- no prior complaint.

☒ Indictment/      Information --- based upon prior complaint [Case number: 24-mj-30382

     Indictment/      Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

## Superseding Case Information

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 1, 2024

Date

  
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Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.